Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of the U.S. Table of	)	RM-9911
Frequency Allocations to Designate	)	
The 2500-2520/2670-2690 MHz Frequency	)	
Bands for the Mobile-Satellite Service	)	
	)	
Petition for Rule Making of the	)	
Cellular Telecommunications Industry	)	
Association Concerning Implementation	)	RM-9920
of WRC-2000: Review of Spectrum and	)	
Regulatory Requirements for IMT-2000	)	

SPRINT CORPORATION COMMENTS ON PETITIONS FOR RULEMAKING

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Summary

Sprint Corporation hereby submits its comments on the Petitions for Rulemaking filed by the Satellite Industry Association ("SIA") and Cellular Telecommunications Industry Association ("CTIA") to allocate the 2500-2520 and 2670-2690 MHz frequency bands for mobile satellite service ("MSS") and to begin the process of allocating additional spectrum for third generation wireless service, respectively. The Petition filed by SIA should be denied. It amounts to nothing more than an attempt to pressure the Commission into allocating additional spectrum for the benefit of SIA members based on misrepresentations of ITU spectral allocations and with no consideration for the damage this would cause existing users of the spectrum such as MMDS/ITFS providers and their customers. The Petition filed by CTIA, while based on an erroneous assumption that WRC-2000 resulted in a mandate that individual nations reallocate spectrum to accommodate global harmonization, does raise valid concerns that should, along with the results of ongoing and planned studies, be considered prior to any reallocation to meet IMT-2000 needs.

SIA Petition: Whether or not MSS will ever evolve into a viable service is very much in doubt in light of the past failures of MSS enterprises (including the Iridium and ICO bankruptcies and the defaulting of Globalstar on its $250 million loan) and the apparent lack of demand for MSS services. At the same time, sharing between MMDS/ITFS and MSS does not appear to be technically feasible. MMDS/ITFS services can not operate above 3 GHz and no suitable, comparable replacement spectrum is available below 3GHz into which MMDS/ITFS could be moved. Therefore, were the MSS services to move into the 2150-2162 or 2500-2690 spectrum bands, MMDS/ITFS

service providers would be put out of business and the public would be deprived of fixed wireless service -- service that the Commission has determined serves the public interest.

The proposal that the Commission increase spectrum available to MSS, which already has substantial spectrum allocated to it, and thereby displace services such as MMDS/ITFS that are viable and already serving rural, remote and currently underserved areas (the public interest justification on which SIA's demand for spectrum is based) is preposterous and should be denied.

CTIA Petition: The Petition filed by CTIA seeks reallocation of spectrum based on what it erroneously views as a virtual mandate by the ITU that available spectrum be increased and that global harmonization be implemented. Contrary to CTIA's portrayal of WRC-2000, neither the concept of spectral harmonization nor the particular spectrum identified for potential harmonization were universally adopted.

Sprint therefore challenges the assumptions made by CTIA on the need for additional spectrum or spectral harmonization for implementation of IMT-2000. Nevertheless, Sprint supports CTIA in its suggestion that the Commission consider certain issues and the results of various ongoing and planned studies prior to any spectral reallocation. Among the questions the Commission should consider are:

1. How much (if any) additional spectrum is necessary to facilitate the provision of IMT-2000 services?

2. Is global harmonization of IMT-2000 spectrum really necessary or can alternatives such as multi-band handsets or software defined radio technology provide the desired roaming capability?

3. Can allocations of new spectrum recently made available or soon to be made available as part of the Commission's Spectrum Policy Statement accommodate the needs of IMT-2000?

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SPRINT CORPORATION COMMENTS ON PETITIONS FOR RULEMAKING

Sprint Corporation hereby submits its comments on the Petitions for Rulemaking filed by the Satellite Industry Association ("SIA") and Cellular Telecommunications Industry Association ("CTIA") in the above-referenced proceedings. As described below, the Petition filed by SIA is nothing more than a thinly veiled attempt to pressure the Commission into allocating additional spectrum for the benefit of its members with absolutely no regard for existing users of the spectrum. Moreover, SIA justifies this demand for spectrum through a completely disingenuous misrepresentation of International Telecommunications Union (ITU) spectral allocations. The SIA Petition is completely without merit and should be denied.

The Petition filed by CTIA, while also based on faulty presumptions of spectral and ITU requirements, reasonably points out that prior to any reallocation of spectrum based on IMT-2000 needs, certain tests must be completed and evaluated. Sprint therefore challenges the assumptions made by CTIA, particularly on the need for additional spectrum or spectral harmonization for implementation of IMT-2000, but encourages the Commission to consider these issues and the results of various ongoing and planned tests prior to any spectral reallocation.

Both the SIA and the CTIA Petitions seek reallocation of spectrum based on what they mischaracterize as a virtual mandate by the ITU that available spectrum be increased and that global harmonization be implemented, respectively.[1] While both the potential need for additional spectrum to support IMT-2000 services and the potential harmonization of spectrum for global roaming purposes were discussed at length before and during WRC-2000, no final analysis of either has been made, much less are individual countries now under a mandate to reallocate existing services to accommodate speculative future spectral needs or global harmonization.

At the recent WRC-2000, the International Telecommunications Union (ITU) identified new spectrum in which countries may implement third-generation mobile services.[2] This identification was for potential allocation intended to meet an estimated future additional need for 160 MHz of spectrum. In particular, the ITU identified the 806-

[1] CTIA does acknowledge that "the ITU clearly understands that the use of these bands by some administrations was not possible given the existing domestic use."

[2] This proposed allocation was by no means a straight-forward or easily reached determination because, like the U.S., different regions and/or countries have already made their own allocations and/or established their own preferences that do not necessarily mesh with international allocation.

960 MHz, 1710-1885 MHz, and 2500-2690 MHz bands for IMT-2000.[3] However, recognizing that all of these bands are heavily used for different purposes throughout the world (the 806-960 MHz band for 2nd generation mobile systems; the 1710-1885 MHz and 2500-2690 MHz bands for mobile, fixed, and broadcasting services), the ITU made clear that the identification of spectrum had no regulatory impact and undertook to conduct studies concerning the use of these bands. WRC-2000 resolutions in no way required countries to implement IMT-2000 in any of the bands, and it was clearly stated that identification of bands "does not preclude the use of any of these bands by any application of the services to which they are allocated." Furthermore, an accompanying resolution acknowledges that relocation of certain services (such as MMDS/ITFS) may not be possible because "existing applications in the bands identified for IMT-2000 require spectrum below 3 GHz for technical reasons."

The SIA Petition

The SIA has asked the FCC to amend the U.S. Table of Frequency Allocations to reallocate the 2500-2520 MHz and 2670-2690 MHz bands to the mobile satellite service ("MSS") based on the WRC-92 and a professed need by the satellite industry for "as much spectrum as possible."[4] The petition does not even acknowledge the existing use of those bands by MMDS/ITFS licensees or that they, not MSS, are the most likely candidates to ensure internet access to rural, remote and currently underserved areas --

[3] Reference is also made to 2300-2400 MHz which is the preferred choice of China (COM 5/24).
[4] SIA Petition at 2.

the public interest justification on which SIA bases its demand for spectrum.[5] Indeed, they already do.

ITFS/MMDS occupies the 2.5 GHz band and is currently offering critical service to the public

Several companies, including Sprint, WorldCom and Nucentrix, have already launched ITFS/MMDS service in the 2.5 GHz band and are offering broadband wireless service to the public. For example, Sprint has invested over $1 billion dollars in licenses that will ultimately cover a total of 90 markets and an estimated 30 million households. Sprint currently offers fixed wireless broadband service in Tucson and Phoenix, Arizona and holds licenses to provide two-way fixed wireless broadband service in Detroit, Houston, Colorado Springs, San Jose, and San Francisco. Sprint has filed applications with the FCC to offer wireless broadband service in 44 markets across the United States and plans to file in additional markets during the February/March 2001 filing window. [6]

Similarly, WorldCom has invested $1 billion dollars and is conducting market trials of ITFS/MMDS broadband service in Boston, Dallas, Baton Rouge, Memphis, and Jackson, MS, and plans additional launches in the near future.[7] Nucentrix Broadband

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[5] SIA Petition at 4.

[6] The new market applications include: Chicago, Ill.; San Francisco, San Jose, Fresno and Eureka, California; Milwaukee, Green Bay and Fon du Lac, Wisconsin, Lansing, Michigan; Las Vegas, Nevada; Salt Lake City, Utah; Boise, Idaho; Cincinnati, Columbus, and Toledo, Ohio; St. Louis, Missouri; Indianapolis and Bloomington, Indiana; Seattle, Washington; Nashville, Tennessee; Omaha, Nebraska; and Denver, Colorado Springs, Ft. Collins and Greeley, Colorado.

[7] See MCI WorldCom Adds Dallas to 'Fixed Wireless' Service Trials," <http://www.wcom.com/about_the_company/press_release/display.phtml?R/20000405>; http://dailynews.yahoo.com/h/ap/20000814/bs/worldcom_broadband_1.html.

Networks plans to operate MDS-based broadband systems in 20 markets by year-end 2001.[8]

Thus, not only have several companies invested heavily in providing MMDS service in the spectrum band that SIA seeks to have reallocated, they are already providing or on the verge of offering the very broadband service to rural, underserved subscribers that SIA promises as a public interest justification for allowing it into the 2.5 GHz band. Furthermore, the MMDS/ITFS providers promise (and in Sprint's case already deliver) their broadband service at a fraction of the cost of MSS service.

U.S. demand for MSS services is questionable

The "growing demand for MSS-developed voice and data services" in the United States on which SIA's demand for additional spectrum is premised is belied by the Iridium and ICO bankruptcies and the defaulting of Globalstar on its $250 million loan.[9] One wireless telecommunications analyst described the sketchy future of satellite-based telephony stating: "the whole premise of (satellite telephony) was based on James Bond fantasies…[t]here's no room (in the market) today and there wasn't even any in 1990. …It doesn't matter how much it costs…there won't be any subscribers."[10] Similarly, cellular news reporter AC attributed the bankruptcies of Iridium and ICO Global to a lack of

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[8] *See* Smith, "Laying the New Broadband Foundation," *Wireless Week* at 21 (Feb. 28, 2000).

[9] Iridium filed for bankruptcy protection on August 13, 1999; ICO Global filed for bankruptcy protection in August 1999 followed by a November, 1999 bail-out of $1.2 billion by Craig McCaw.

[10] Globalstar and ICO Fate Murky After Iridium Demise, Reuters (March 23, 2000) (quoting Herschel Shosteck, Herschel Shosteck & Assoc.). While SIA weakly attempts to dismiss obvious concerns that the Iridium debacle is indicative of the insolvency of MSS systems in the U.S., the subsequent failure of ICO and financial troubles of Globalstar nullify this defense.

demand for satellite-based services, stating simply "The sector has met with a lukewarm response from users because of expensive rates, bulky equipment and patchy coverage."[11]

The ITU has not mandated the clearing of the 2.5 GHz spectrum for MSS

The SIA Petition and the 1992 allocation on which it relies predated WRC-2000,[12] which, while it identified a portion of the 2.5 GHz band (2500-2520 and 2670-2690 MHz) for a satellite-delivered component of IMT-2000, did so with reference to a new footnote (S5.AAA) to the ITU Table of Frequency Applications that merely states that "the bands, or portions of the bands 1710-1885 MHz and 2500-2690 MHz, are identified for use by administrations wishing to implement [IMT-2000] in accordance with resolution [COM5/24] (WRC-2000). This identification does not preclude the use of these bands by any application of the service to which they are allocated and does not establish priority in the radio regulations."[13] It also notes that (a) the bands are allocated on a co-primary basis to MSS and other services; (b) other services operate or are planned in the bands; and (c) "Studies of potential sharing and coordination between the satellite component of IMT-2000 and the terrestrial component of IMT-2000, mobile-satellite service applications and other high-density applications in other services such as point-to-multipoint communication / distribution systems in the 2500-2520 MHz and 2670-2690 MHz bands are not finished." [14] The sharing and coordination studies must be completed before the bands may be made available for the satellite component of IMT-2000.

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[11] See "ICO Bailed Out," AC Cellular News, November 9, 1999.
[12] WRC 2000 was held May 8, 2000-June 2, 2000.
[13] Provisional Final Acts of the World Radio Telecommunications Conference (Istanbul, 2000) (WRC-2000) Article S5 at 21.
[14] Id., Resolution [COM5/26] (WRC-2000) at 1.

Thus, while WRC-2000 identified a portion of the 2.5 GHz band as potentially available to individual nations for implementation of MSS service, such use is on a co-primary basis, subject to sharing with other services, and at the discretion of individual nations.[15]

Sharing between MSS and ITFS/MMDS service is not feasible and displacing ITFS/MMDS for MSS would thwart the public interest

Sharing between MMDS/ITFS and terrestrial and satellite mobile services does not appear technically feasible.[16] MMDS/ITFS services can not operate above 3 GHz and no suitable, comparable replacement spectrum is available below 3GHz into which MMDS/ITFS could be moved.[17] Therefore, were the MSS services to move into the 2150-2163 or 2500-2690 spectrum bands, MMDS/ITFS service providers would be put out of business and the public would be deprived of fixed wireless service -- service that the Commission itself has identified as critical to its goals of increasing competition and extending the reach of advanced services to rural and underserved areas. On the other hand, if Sprint and other MMDS/ITFS operators are permitted to continue on their

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[15] Other bands, including 1524-1544 MHz, 1544-1559 MHz, 1626.5-1644.5 MHz, 1645.4-1660.5 MHz, 1610-1626.5 MHz and 2483.5-2500 MHz were identified for the satellite component of IMT-2000.

[16] As stated above, studies of potential sharing and coordination between the satellite component of IMT-2000 and the terrestrial component of IMT-2000, mobile-satellite service applications and other high-density applications in other services such as point-to-multipoint communication / distribution systems in the 2500-2520 MHz and 2670-2690 MHz band have yet to be completed.

[17] In the *Emerging Technologies Order*, the Commission recognized that "there are no frequency allocations above 3 GHz that could readily support the requirements of MDS, which are wide-area and point-to-multipoint in nature. *Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies*, 7 FCC Rcd 6886 (1992) at 6889.

present course, they will soon breathe life into the Commission's goals of bridging the digital divide and meeting the critical and immediate demand for broadband capacity.

As Chairman Kennard recently noted, " [o]ur Internet traffic is doubling every 100 days, and over 40 percent of U.S. households now have Internet access." However, less than three percent of all Internet users in North America use Broadband services.[18] The Wall Street Journal reports that "the demand already exists among many consumers who are still waiting for broadband offerings to come to their hometowns."[19] Sprint projects that demand for high-speed broadband connections by Internet users will increase from 3% to 50% by 2006.

To a large extent, the speed at which broadband services are deployed depends on the availability of last-mile facilities. There are currently two dominant methods of broadband access available to residential, small business, and rural customers –DSL and cable.[20] Timely provision of both of these services is dependent upon incumbent service providers, who have little incentive to expedite access to their facilities by competitors.[21] The third method, fixed wireless through MMDS, offers a critical facilities-based

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[18] Remarks by Deborah A. Lathen, Chief, Cable Services Bureau, Federal Communications Commission before the National Governors' Association at 1 (Feb. 27, 2000 (as prepared for delivery).

[19] Wall Street Journal, Stephanie N. Mehta & Kathy Chen, "U.S. Market for Broadband Is Barely Tapped" at B8 (Jan. 12, 2000).

[20] For most Americans, if they can get broadband services at all, they may only choose between DSL service from the ILEC or a cable modem service controlled by AT&T or Time Warner. In many cases, consumers are not able to choose their Internet Service Provider (ISP) for these services.

[21] As the Commission notes in the NOI, DSL faces technical limits to deployment in (or by means of) incumbent LEC networks. It generally requires a continuous copper loop to the customer (i.e., an absence of Digital Loop Carrier systems), has been limited by signal fade to a roughly 3-mile distance from the central office, is incompatible with the load coils and bridged taps that may be installed on customer lines, and may contribute to signal interference problems. (See NOI at Appendix A at ¶ 7).

alternative to the existing providers and a solution to the expense and delays of constructing last-mile broadband capabilities.[22] The Commission recognized the significance of wireless cable as a facilities-based broadband alternative in its Advanced Services NOI, stating:

> [w]ireless cable spectrum gives a new broadband last mile, and one allegedly cheaper to use than a cable-TV-based last mile, to companies that already possess most of the other necessary inputs for broadband…. It appears to us that the combination of wireless cable spectrum with existing switched telecommunications know-how opens the possibility of a significant, additional last mile to the residential customer.[23]

Certainly, in light of the enormous and immediate demand for broadband service, SIA's proposal to allocate the 2.5 GHz band to MSS --a service with a dubious future that, on its own admission, will not offer broadband access for years, and thereby displace fixed wireless --which offers broadband access today, would be absurd.

While WRC-2000 identified a portion of the 2.5 GHz band as potentially available to individual nations for implementation of MSS service, such use is on a co-primary basis, subject to sharing with other services, and at the discretion of individual nations. There is absolutely no mandate that the 2.5 GHz band be cleared for MSS

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[22] There have been some limited facilities-based strategies deployed by smaller CLECs to serve mass markets in discrete local areas. Some companies with their own loops, like RCN Corporation, with its Starpower service in the District of Columbia, are directly targeting residential users. *See* www.starpower.net. Some DSL-oriented companies are leasing UNE loops on a city-by-city basis as well. These are targeted efforts, however, unlike the national strategies of AT&T and its cable affiliates, the large ILECs, and the MMDS plan of MCI WorldCom and Sprint.

[23] *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable And Timely Fashion, and Possible Steps To Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, CC Dkt. No. 98-146, Notice of Inquiry*, FCC 00-57, Attachment A ¶ 16 (rel. Feb. 18, 2000); see also Chairman Kennard's CTIA Address ("[Wireless has] the potential to be much more than a substitute. You are much more than an add-on, an adjunct, a niche-filler, whether to wireline or any other service.").

service and certainly not at the expense of a viable, critical service such as the existing fixed wireless service. The SIA Petition is wholly without merit and should be denied.

CTIA Petition

The CTIA Petition for Rulemaking urges the Commission to begin the process of designating additional spectrum for third generation wireless service because "current and future scheduled spectrum allocations in the United States are neither sufficient for development of new 3G services, nor in harmony with likely worldwide implementation of IMT-2000." [24] CTIA's Petition is thus largely based on its false assumption that: "administrations from around the world, including the United States, agreed that harmonized spectrum allocations are critical to fulfill the great promise of IMT-2000." [25] In fact, this universal acceptance of the need for global harmonization was not reached, nor was harmonization determined essential to the successful provision of IMT-2000.

WRC-2000 did not mandate global harmonization

WRC-2000 concluded with the recommendation that national administrations evaluate the possibility of harmonization by conducting studies to consider "harmonized frequency arrangements for the implementation of IMT-2000…that take into account the services currently using the bands or planning to use the bands…"[26] It did not send administrations off with a mandate to indiscriminately reallocate spectrum to accommodate global roaming.

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[24] CTIA Petition at 2.
[25] Id.
[26] Resolution [COM5/24](WRC-2000) at 5.

For example, while CEPT, the European regional telecommunications and postal organization, strongly advocated the identification of a contiguous global band at 2.5 GHz (2520-2670 MHz for the terrestrial component, and 2500-2520 MHz and 2670-2690 MHz for the satellite component), CITEL, the Inter-American Telecommunications Commission, and the United States opposed the CEPT proposal The U.S. objected to the CEPT proposal because the Department of Defense uses portions of the 1.8 GHz band. U.S. ITFS and MDS providers objected to the CEPT proposal because they use portions of the 2.5 GHz band. Similarly, many CITEL countries, including Canada, Brazil and Mexico, who have substantial fixed wireless applications operating in the 2.5 GHz band also objected to the CEPT proposal, instead advocating identification of the 1.8 GHz band for IMT-2000.

Members of the Asian regional telecommunications organization, APT, could not agree on any single band due to extensive incumbent operations in the 1.8 GHz and 2.5 GHz bands in different Asian countries. As a result, APT proposed identification of the 1.8 GHz and 2.5 GHz bands, as well as the 806-960 MHz band. Unlike the other regional proposals, the APT proposal stated clearly that individual countries had the discretion to choose any, all, or none of the identified bands for the implementation of IMT-2000. Many Arab, African and former members of the Soviet Union did not support the identification of any additional spectrum for IMT-2000.

Thus, contrary to CTIA's portrayal of WRC-2000 as having resulted in a universal play for harmonized spectrum, neither the concept of spectral harmonization nor the particular spectrum identified for potential harmonization were universally adopted. Spectral harmonization was primarily advocated by entities in Europe, where

international roaming is as commonplace as interstate roaming is in the U.S., and where the designated spectrum is already used for GSM service. For the United States, which is isolated from Europe and its GSM standard, "harmonization" with Europe is a less compelling goal.

Multi-band handsets meet global roaming needs and open new spectrum for IMT-2000 consideration

The concept of global harmonization is an appealing one in theory. In practice, however, global roaming through equipment such as multi-band handsets is a much more practical solution than spectrum reallocation. Multi-band handsets are already widely available in the PCS marketplace at a cost only slightly higher than single-band handsets. Using multi-band handsets to meet global roaming needs enables the U.S. and its neighboring North American countries to continue providing critical and immediately useful services such as MMDS/ITFS services and opens the possibility of utilizing the full range of available spectrum.

Among the spectrum available in the United States are 30 MHz of spectrum in the 700 MHz (747-762 and 777-792 MHz) band to be auctioned in early 2001, and 90 MHz of Advanced Mobile Fixed Communications Service ("AMFCS") that may soon be allocated to mobile and fixed wireless services, including IMT-2000. In fact, the Commission's Policy Statement declares: "we believe this [90 MHz] allocation would provide sufficient bandwidth to support commercial AMFCS operation by multiple competing operators…a portion of these bands correspond to the frequencies identified for IMT-2000 at the 1992 World Administrative Radio Conference (WAR-92), which

would facilitate international roaming.[27] Additional spectrum will also be made available in upcoming auctions of C and F block PCS licenses. The availability of this spectrum should be considered by the Commission in any evaluation of IMT-2000 spectral requirements.

Studies must be conducted and questions considered prior to any IMT-2000 allocation

The CTIA Petition fails to establish either that the existing spectrum allocations are insufficient or that worldwide harmonization is required for IMT-2000. Nevertheless, Sprint does support CTIA's suggestion that the Commission must consider the results of studies, including those undertaken by NTIA evaluating the potential reallocation of the federal government from 1710-1850 MHz band. Further, the Commission should initiate studies such as those suggested by the ITU evaluating international use of the 806-960, 1710-1885 MHz and 2500-2690 MHz bands, as well as studies evaluating measures for better utilization of existing spectrum; potential bands of spectrum available for reallocation, if necessary; and the possibility of sharing prior to any new determinations with regard to spectrum allocation.

More specifically, Sprint urges the Commission to consider the following as part of the CTIA inquiry:

1. How much (if any) additional spectrum is necessary to facilitate the provision of IMT-2000 services?

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[27] *Principles for Reallocation of Spectrum to Encourage the Development of Telecommunications Technologies for the New Millennium*, 14 FCC Rcd 19868, 19878 (1999). This allocation will include 1710-1755, 2160-2165 MHz and 2110-2150 MHz.

2. Is global harmonization of IMT-2000 spectrum really necessary or can alternatives such as multi-band handsets or software defined radio technology provide the desired roaming capability?

3. Can allocations of new spectrum recently made available or soon to be made available as part of the Commission's Spectrum Policy Statement accommodate the needs of IMT-2000?

Conclusion

Both the SIA and the CTIA Petitions seek reallocation of spectrum based on what they mischaracterize as a virtual mandate by the ITU that available spectrum be increased and that global harmonization be implemented, respectively. While both the potential need for additional spectrum to support IMT-2000 services and the potential harmonization of spectrum for global roaming purposes were discussed at length both before and during WRC-2000, no final analysis of either has been made, much less are individual countries now under an international mandate to reallocate existing services to accommodate speculative spectral needs or global harmonization.

The Petition filed by SIA is nothing more than an attempt to accumulate spectrum for the benefit of its members with no regard for existing users of the band. The Petition is based on a misrepresentation of ITU spectral allocations, is completely without merit, and should be denied.

The Petition filed by CTIA, while also based on faulty presumptions of spectral and ITU requirements, reasonably points out that prior to any reallocation of spectrum based on IMT-2000 needs, certain tests must be completed and evaluated. Sprint thus challenges the assumptions made by CTIA on the need for additional spectrum or

spectral harmonization for implementation of IMT-2000, but encourages the Commission to consider these issues and others as well as the results of various ongoing and planned tests described above prior to any spectrum reallocation.

Respectfully submitted,

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